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VIA EMAIL

January 7, 2020

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***Re: A.O.A. et al. v. The Doe Run Resources Corp. et al. – Conferral Regarding
Discovery Deficiencies***

Dear Kris and Beth:

I write regarding certain discovery deficiencies in the above-referenced case and to schedule a meet and confer regarding the same.

1. Plaintiff Profile Sheets

The Court has ordered Plaintiffs to submit completed Plaintiff Profile Sheets within 60 days of Defendants' Notice of Removal of new actions to federal court. *See Case Management Order No. 10 [Doc. 303]*. Our records indicate that Plaintiffs in five *Reid*-consolidated actions filed between 2016 and 2018 have yet to serve Profile Sheets in accordance with this requirement (4:16-cv-01731, 4:18-cv-00575, 4:17-cv-01270, 4:18-cv-00585, and 4:18-cv-00594). *See Enclosure 1, Tab 1*.

Further, Case Management Order No. 2 [Doc. 103 at ¶ 5] requires that all Plaintiff Profile Forms be notarized in accordance with Peruvian law. Defendants have identified 224 instances in which 141 individual Plaintiffs failed to comply with the notarization requirement, whether by failing to notarize the original or supplemental Profile Sheets or, in a small number of instances, producing a Profile Sheet with an incomplete or deficient notarization. *See Enclosure 1, Tab 2*.

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2. Production of Medical and Educational Records

Defendants have identified numerous deficiencies in the production of medical and education records. For example, there are many instances in which Plaintiffs have failed to produce records or no records certifications from providers identified in their Profile Sheets. And a number of Plaintiffs, particularly in later groups or those unassigned to any group, have produced no records at all.

3. Verifications for Initial Discovery Cohort's May 20, 2019 Interrogatory Responses

On December 9, 2019, Defendants received the verifications for the Initial Discovery Cohort's Responses to Defendants' Interrogatories, dated March 8, 2019. None of these verifications are notarized, although there is a place on each document for such a notarization. Further, the signature pages do not identify to which discovery responses they relate. Adding to the confusion, Plaintiffs appear to have served two signature pages per Plaintiff, but there were three sets of written discovery responses to which Plaintiffs responded. Therefore, it is impossible to correlate the signature pages to the correct discovery responses.

In light of the foregoing, Defendants request a telephonic conference during the week of January 13, 2020. Defendants wish to discuss these deficiencies, obtain Plaintiffs' position regarding these deficiencies, and establish a plan and schedule by which Plaintiffs will produce complete information in compliance with the Court's orders. Please let me know your availability for this conference. I look forward to discussing these issues with you.

Sincerely,

A handwritten signature in black ink, appearing to read "Geoffrey M. Drake", written in a cursive style.

Geoffrey M. Drake

CC: All Counsel

Enclosure

[illegible]

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Plaintiffs with one or more deficient notarizations in PPS		PLF ID